

IN THE UNITED STATES DISTRICT COURT,
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DOCKETED

DEC 8 1981

DOCKETED

DEC 9 1981

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DEC 24 1981

THE MAGNAVOX COMPANY, a
Corporation, and
SANDERS ASSOCIATES, INC., a
Corporation,

Plaintiffs,

v.

APF ELECTRONICS, INC., ET AL.

Defendants.

Consolidated Civil
Action Nos.

77 C 3159 ✓

78 C 4951 ✓

78 C 5041 ✓

80 C 4124 ✓

JUDGE GEORGE N. LEIGHTON

NOTICE OF TAKING DEPOSITION

PLEASE TAKE NOTICE that commencing at 9:30 A.M. on the 29th day of December, 1981, at the offices of Fitzpatrick, Cella, Harper & Scinto, 277 Park Avenue, New York, New York, the plaintiffs in the above-identified action will take the deposition of General Instrument Corporation (hereinafter "deponent"), 1775 Broadway, New York, New York pursuant to Rule 30(b)(6), F.R.Civ.P. A subpoena duces tecum is to be served on the deponent. The matters on which examination is requested in the subpoena under Rule 30(b)(6) are set forth in Attachment B hereto. Deponent is requested to designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, as to the matters set forth in Attachment B hereto and known or

reasonably available to deponent and is requested to make this designation available to plaintiffs at least five days prior to the commencement of the deposition. The documents and things requested to be produced in the subpoena are set forth in Attachment A hereto.

The deposition will be taken upon oral examination before a notary public, or before some other officer authorized by law to administer oaths. The oral examination will continue from day-to-day or by adjournment until completed.

Dated: December 4, 1981



Theodore W. Anderson, Esq.
James T. Williams, Esq.
Attorneys for Plaintiffs

Neuman, Williams, Anderson & Olson
77 West Washington Street
Chicago, Illinois 60602
312/346-1200

ATTACHMENT A

1. Schematic diagrams and circuit diagrams showing the internal circuitry of the integrated circuit components having the following designations:

8600-1
AY-3-8500-1
AY-3-8900
AY-3-8900-1

2. Documents describing the internal circuitry of the integrated circuit components identified in paragraph 1 above and the operation thereof.

3. Specifications, specification sheets, customer procurement specifications, application notes or literature, catalogs or catalog sheets, films, brochures, programming manuals or any other documents which describe or depict the manner of use or operation of the integrated circuit component referred to in paragraph 1 hereof.

ATTACHMENT B

1. The design, circuitry, and operation of the internal circuitry of the integrated circuit components having the following designations:

8600-1
AY-3-8500-1
AY-3-8900
AY-3-8900-1

2. The manner of use and operation of the integrated circuit components referred to in paragraph 1 hereof.